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14 Attorneys for Defendants Power  
Ventures, Inc. and Steve Vachani  
15

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

18 FACEBOOK, INC.,

19 Plaintiff,

20 -against-

22 POWER VENTURES, INC. d/b/a POWER.COM, a  
California corporation; POWER VENTURES, INC.  
23 a Cayman Island Corporation, STEVE VACHANI,  
an individual; DOE 1, d/b/a POWER.COM, an  
individual and/or business entity of unknown nature;  
24 DOES 2 through 25, inclusive, individuals and/or  
business entities of unknown nature,

26 Defendants.

27 Case No. 5:08-CV-05780 JW

28 **DEFENDANT POWER VENTURES,  
INC.'S RESPONSE TO  
FACEBOOK'S MOTION TO  
COMPEL PRODUCTION OF  
DOCUMENTS**

1 As it has repeatedly indicated during the meet and confer process, defendant Power  
2 Ventures, Inc. ("Power") does not believe that its source code is relevant to any of the three  
3 remaining claims Facebook asserts in this litigation. Nevertheless, Power will produce its source  
4 code pursuant to Section 8 of the Stipulated Protective Order entered by this Court on February 4,  
5 2011. Power requests that the parties promptly meet and confer to discuss the manner in which the  
6 source code shall be produced and reviewed to ensure compliance with the protective order and to  
7 ensure that there is no unauthorized disclosure of Power's highly confidential source code.

8 Dated: August 17, 2011

BURSOR & FISHER, P.A.

10 By \_\_\_\_\_ /s/  
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